Internal deliberative pre-decisional draft

WEST LAKE LANDFILL

Missouri Superfund site

ISSUE SUMMARY:

The West Lake Landfill Superfund site in Bridgeton, Missouri, contains radiologically-impacted material (RIM) from the Manhattan Project and includes an adjacent landfill, a portion of which has been smoldering since 2010 (referred to as a "subsurface smoldering event" which is a chemical reaction similar to an underground fire). EPA is working toward the selection of a final remedy for the site. Recent concerns relate to perceived health effects and other potential impacts if the underground chemical reaction should reach the RIM, as well as potential groundwater contamination from the RIM. In **November 2016**, EPA received news of a lawsuit filed on behalf of a family in the nearby Spanish Village neighborhood. The lawsuit alleges radioactive contamination in dust and dirt samples. Out of an abundance of concern, EPA is developing a focused residential sampling plan to investigate the allegations.

UPCOMING MILESTONES:

The timing of upcoming milestones is dependent on receiving adequate work products from the Potentially Responsible Parties (PRPs).

BACKGROUND:

West Lake Landfill is a former sanitary landfill that closed in the 1970s. In 1973, a now-defunct trucking company mixed 39,000 tons of soil with 8,700 tons of a low-level radioactive material called leached barium sulfate and brought it to the landfill as "clean fill" material. The landfill used the material to cover compacted trash in two areas as part of routine operations.

EPA added the site to the Superfund National Priorities List (NPL) in **1990**. Located near the Lambert-St. Louis Airport, the site is surrounded by commercial/industrial facilities with residential areas less than a mile away and the Missouri River approximately two miles to the west. The site includes two operable units (OU1 and OU2) as described below:

<u>Operable Unit 1 (OU1)</u> is comprised of two areas where 8,700 tons of RIM from the Manhattan Project mixed with approximately 38,000 tons of soil were used as daily cover for refuse in the landfill operations in 1973. The PRPs for OU1 are Bridgeton Landfill LLC and Rock Road Industries, Cotter Corporation, and the U.S. Department of Energy.

In **2008**, EPA issued a Record of Decision (ROD) for OU1 that called for construction of an engineered landfill cover over the RIM. In response to community requests to reconsider this approach and recommendations from the National Remedy Review Board (NRRB), EPA subsequently required the PRPs to perform additional work that will support consideration of a full range of remedial alternatives at OU1, including leaving all of the RIM in place, partial excavation, and full excavation.

In **2009**, at the request of environmental groups, EPA put the cleanup on hold to conduct more testing, analysis and public involvement.

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In **April 2016**, EPA reached an enforceable agreement with one of the PRPs to take actions to monitor for and protect the RIM against subsurface reactions, including installation of a heat extraction system, installation of additional temperature monitoring probes and completion of placement of a synthetic cap over the entire Bridgeton Landfill. EPA has also been working with PRPs to evaluate the feasibility of a physical barrier.

<u>Operable Unit 2 (OU2)</u>: OU2 includes the former Bridgeton Landfill, which was used to dispose of sanitary waste, industrial waste, and demolition fill until 2004. The SSE (underground smouldering/fire) has been ongoing in OU2 since **2010**.

In **2008**, EPA issued a ROD for OU2 that deferred remediation to the State of Missouri's solid waste program. In **2013**, the State of Missouri filed a lawsuit against Bridgeton Landfill for violations of environmental laws, and is requiring the company to monitor and address the movement of the underground chemical reaction in OU2.

KEY EXTERNAL STAKEHOLDERS:

⊠ Congress	□Industry	⊠States	☐ Tribes ☑ Media ☑ Other Federal Agency ☐ NGO
⊠Other	(name of stakeho	older)	Community Groups

There is a significant level of interest by congressional, media, and community members in the upcoming final remedy decision, as many have voiced their demand for full excavation of the RIM. The community and congressional members have expressed frustration with the time it has taken to complete the additional investigations and evaluations necessary for EPA to make its decision on the OU1 remedy. Over the past two years, EPA has been requested to relocate residents living within a two-mile radius of the site. Based upon available sampling data, EPA has determined that conditions at the site do not warrant temporary or permanent relocations at this time. The recent lawsuit alleging radioactive contamination inside a nearby residence has renewed relocation requests from some community members.

In **November 2015**, MO Senators Roy Blunt and Claire McCaskill, and Rep. Ann Wagner and William Lacy Clay, introduced bi-partisan legislation in both houses to transfer remediation authority and control of the cleanup to the Army Corps of Engineers' Formerly Utilized Sites Remedial Action Program (FUSRAP). The Senate bill (S.2306) passed by unanimous consent in Feb. 2016; the House bill (H.R.4100) remained in committee. In written testimony the Corps noted, "The Administration has serious concerns about this legislation and cannot support it in its current form...[as it] will likely further unnecessarily delay the cleanup of the site and it will saddle the general taxpayer with the cost of cleanup and cost recovery as compared to the PRPs at the site."

MOVING FORWARD:

EPA has required the PRPs to submit a Remedial Investigation Addendum and a Final Feasibility Study, both of which are required to support the Agency's final remedy decision for OU1. These documents will

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describe the nature and extent of contamination and will evaluate the remedial alternatives. Once these documents are finalized, Region 7 will consult with the NRRB for its comments, and will release the proposed remedy decision to the public for review and comment. Following the comment period, EPA will issue its final remedy decision that will address cleanup of OU1.

EPA has identified the need to better characterize potential releases of contaminants into groundwater beneath the Site (OU3). The work to perform this groundwater characterization is targeted to begin in 2017.

EPA is focused on ensuring that remedy decisions are compliant with the law and based on sound science. EPA plans to hold the PRPs accountable for meeting deadlines as it works toward completing its final proposed remedy and ROD in the months ahead.

Out of an abundance of concern, EPA is developing a focused residential sampling plan to investigate recent allegations that radioactive contamination has been found inside a nearby home. We will rely on scientifically-sound data to guide our efforts and to determine our next steps.

LEAD OFFICE/REGION: REGION 7 OTHER KEY OFFICES/REGIONS: OLEM/OECA/OGC/ORD